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10 **UNITED STATES BANKRUPTCY COURT**
NORTHERN DISTRICT OF CALIFORNIA
11 **SAN FRANCISCO DIVISION**

12 **In re:**

13 **PG&E CORPORATION,**

14 **- and -**

15 **PACIFIC GAS AND ELECTRIC**
16 **COMPANY,**

17 **Debtors.**

- 18 ☐ Affects PG&E Corporation
19 ☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

20 ** All papers shall be filed in the Lead Case, No.*
21 *19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT ON
RESPONSES TO ONE HUNDRED FOURTH
THROUGH ONE HUNDRED SIXTH
OMNIBUS OBJECTIONS TO CLAIMS AND
REQUEST FOR ORDERS BY DEFAULT AS
TO UNOPPOSED OBJECTIONS**

[Re: Dkt. Nos. 11218, 11221, and 11224]

**Regarding Objections Set for Hearing
October 19, 2021, at 10:00 a.m. (Pacific Time)**

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as
3 debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the
4 above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule
5 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District
6 of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing*
7 *Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Dkt No. 1996] (“**Case**
8 **Management Order**”), that the Court enter orders by default on the following three omnibus claims
9 objections (collectively, the “**Omnibus Objections**”)¹:

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Docket Number	Omnibus Objection
11 11218	<i>Reorganized Debtors’ One Hundred Fourth Omnibus Objection to Claims (ADR No Liability Claims)</i> (the “ One Hundred Fourth Omnibus Objection ”)
12 11221	<i>Reorganized Debtors’ One Hundredth Fifth Omnibus Objection to Claims (Bestwall Claims)</i> (the “ One Hundredth Fifth Omnibus Objection ”)
13 11224	<i>Reorganized Debtors’ One Hundred Sixth Omnibus Objection to Claims (No Legal Liability Claims)</i> (the “ One Hundred Sixth Omnibus Objection ”)

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16 **RELIEF REQUESTED IN THE OMNIBUS OBJECTIONS**

17 The Omnibus Objections seek to disallow and/or expunge the Proofs of Claim listed in
18 Exhibit 1 to each of the Omnibus Objections.

19 **NOTICE AND SERVICE**

20 The Reorganized Debtors filed a Notice of Hearing with respect to each Omnibus Objection
21 [Docket Nos. 11220, 11223, and 11226]. The Omnibus Objections also were supported by the
22 respective declarations of Robb McWilliams [Docket No. 11219] and A. Anna Capelle [Docket Nos.
23 11222 and 11225]. The Omnibus Objections, the Notices of Hearing, and the Declarations were
24 served as described in the *Certificate of Service of Alain B. Francoeur*, filed on September 16, 2021

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26 ¹ Concurrently with the Omnibus Objections, the Reorganized Debtors filed the *Reorganized Debtors’*
27 *One Hundred Seventh Omnibus Objection to Claims (McColm Claims)* [Docket No. 11227] and
28 *Reorganized Debtors’ One Hundred Eighth Omnibus Objection to Claims (PURPA Claims)* [Docket
No. 11230]. These two omnibus objections have each been continued to the omnibus hearing on
November 9, 2021, with respect to all claims therein. See Docket Nos. 11356 and 11323.

[Docket No. 11269], each holder of a claim listed on Exhibits 1 to each of the Omnibus Objections received a notice customized to include (i) the claim number, debtor, claim amount and priority, and the basis for Reorganized Debtors' objection with respect to the applicable claim to be disallowed and/or expunged or allowed in a reduced amount, and, if applicable (ii) the claim number, claim amount and priority of the surviving claim for each counterparty.

The deadline to file responses or oppositions to the Omnibus Objections has passed. The Reorganized Debtors have received the following formal and informal responses:

Docket No.	Claimant	Claim No.	Resolution
One Hundred Fourth Omnibus Objection			
Informal	Russo, Wayne	66988	The Reorganized Debtors will seek to resolve the Claim through the Court-approved ADR procedures, and request that the Hearing on the Claim be taken off calendar and continued indefinitely in the interim.

DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am an attorney with the law firm of Keller Benvenutti Kim LLP, co-counsel for the Reorganized Debtors.
2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no responses have been filed with respect to the Omnibus Objections except as described herein.
3. This declaration was executed in Sunnyvale, California.

WHEREFORE, the Reorganized Debtors hereby request entry of Orders (i) disallowing and/or expunging or (ii) allowing in a reduced amount the Proofs of Claim listed in **Exhibit 1**² to this

² The portions of **Exhibit 1** listing Claims to be expunged pursuant to the One Hundred Fourth Omnibus Objection have been redacted in accordance with the *Order Granting Motion to Redact Documents Filed in Support of Reorganized Debtors' Omnibus Objection to Claims*, entered on September 13, 2021 [Docket No. 11242]. Unredacted versions for the Court's review will be filed under seal.

1 Request, which listed Claims are identical to those listed in Exhibit 1 to each of the Omnibus
2 Objections, except as otherwise discussed above.

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4 Dated: October 12, 2021

KELLER BENVENUTTI KIM LLP

5 By: /s/ Thomas B. Rupp
6 Thomas B. Rupp

7 *Attorneys for Debtors and Reorganized Debtors*
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